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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

26 MAY 1993

THE SECRETARY - ROOM 222

IN REPLY REFER TO:

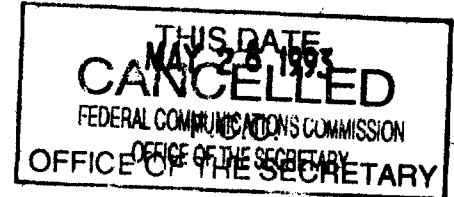
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RECEIVED

MAY 27 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RECEIVED



Honorable William V. Roth, Jr.
United States Senate
Washington, D.C. 20510

Dear Senator Roth:

This is in reply to your letter of May 5, 1993, in which you inquired on behalf of several of your constituents regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). This Notice proposes comprehensive changes to the Commission's Rules governing the private land mobile radio services operating in the frequency bands below 512 MHz.

Your constituents are specifically concerned about the impact of these changes on radio control (R/C) hobby users. Enclosed is a discussion paper concerning

Congressional

DUES 5-27-93

PLEASE MAKE 2 EXTRA COPIES OF INCOMING, ATTACHMENTS,
AND REPLY FOR DOCKET FILE, ROOM 222.

CONGRESSIONAL CORRESPONDENCE TRACKING SYSTEM
05/20/93

LETTER REPORT

CONTROL NO. DATE RECEIVED DATE OF CORRESP DATE DUE DATE DUE OLA(857)

WILLIAM V. ROTH, JR.
DELAWARE

104 HART SENATE OFFICE BUILDING
TELEPHONE: 202-224-2441

United States Senate

WASHINGTON, DC 20510

May 5, 1993

PBB

COMMITTEES
GOVERNMENTAL AFFAIRS
FINANCE
BANKING, HOUSING AND URBAN AFFAIRS
JOINT ECONOMIC COMMITTEE

92-235

2103

The Honorable James H. Quello, Chairman
Federal Communications Commission
Office of Legislative Affairs Room 802
1919 M Street N.W.
Washington, D.C. 20554

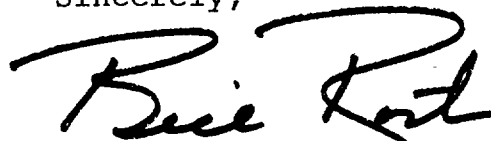
Dear Chairman Quello:

I am writing to share with you the views of my constituents on a proposed FCC rulemaking regarding the radio frequency used by operators of model aircrafts.

Many Delawareans have contacted me to express their opposition to changes that would limit their use of the radio frequencies in the 72-76 MHz band. To ensure that their concerns are included in the record on this rulemaking, enclosed are copies of the correspondence I have received.

Thank you for your attention to this matter.

Sincerely,



William V. Roth, Jr.
United States Senate

WVR/mdf

Enclosures

The Honorable William V. Roth Jr.
U.S. Senate
Washington, D.C. 20510

It seems that not even my hobbies are free from government intrusion. But why should I expect anything different, when every other aspect of daily life is impacted by Washington.

The Federal Communications Commission has decided that a block of radio frequencies, set aside for radio control of model cars, boats, and airplanes, would better serve the needs of our citizens by allocating some of these frequencies to mobile radio use (and the special interests of the mobile radio industry) rather than the needs thousands of hobbyist who now use these frequencies.

The FCC has issued a "Notice of Proposed Rule Making" specifically (NPRM-PR Docket 92-235), which if implemented, would have a profound effect on model frequency use. Developed by the FCC Land Mobile Service, it creates a massive frequency restructuring which will affect Part 95 where our R/C frequency use lives.

Specifically, if the FCC is permitted to allocate frequencies for mobile use that are adjacent to, and interspersed, with those frequencies now used by R/C hobbyist, (signals of which are 4 times as powerful), the results would be devastating. Two-thirds of our R/C frequencies would be rendered useless. The financial impact would be bad enough (a lot of hobbyist are retired), the safety impact would be catastrophic. A hobbyist would never know when a mobile radio unit might be in their area. Transmitting with that mobile unit could cause them to loose control of their R/C airplane with the potential for property damage or personal injury.

The current number of R/C frequencies is needed to serve the huge number of hobbyist. If the FCC has its way, and we do loose two-thirds of our frequencies, a hobbyist could go to his flying field and wait for hours to get a free frequency or, more likely, never get to fly his plane at all. This, consequently, would drive many from the hobby.

I, personally have been building and flying model airplanes for 44 years. I have been using radio controlled aircraft for the past 10 years. I am currently building a P-51 Mustang World War II vintage aircraft with a wingspan of 72 inches. This model, when finished will represent an investment of nearly \$600 when complete with radio control.

We hobbyist who enjoy model aircraft, have invested thousands of dollars in planes and related equipment and plan to continue to do so. Also involved are the many thousands of hobbyist who enjoy radio controlled model cars and boats.

In the State of Delaware, two model airplane clubs dominate. Together, these two clubs account for approximately 250 active members, and the numbers are growing monthly.

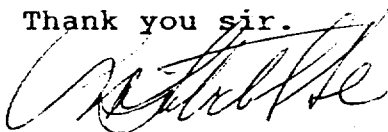
I belong to the Delaware Radio Control Club. The club is chartered by the Academy of Model Aeronautics and every club member must be a member of AMA. The AMA is a national organization that provides the liability insurance for the model aircraft hobbyist. The AMA has a very strict set of safety rules each member must follow concerning the use of radio control aircraft, the frequencies used, and the control of spectators who visit the flying field.

Safety is foremost, both for the hobbyist and the spectator. I don't wish to be redundant, but the current FCC proposal jeopardizes the safety of all who participate in the flying sport.

The enjoyment of this hobby is worldwide. I am sending you a military newspaper with an article on how our service personnel also enjoy the sport of model flying.

Senator Roth, please do what you can to protect the hobbyist who have invested so much in their hobby and want to continue to do so. These R/C frequencies are in current use, heavy use. It would be a different story if these frequencies were in limited use, but that's anything from the truth. We hobbyist know the FCC has absolutely no regard for the thousands who enjoy the hobby of radio control models, none what-so-ever. We need your help!!

Thank you sir.



C.M. Sutcliffe
1201 Janice Dr.
Newark, DE. 19713

February 24, 1993

The Honorable Senator Roth
3021 Federal Building
Wilmington, Delaware 19801

Dear Senator:

I have been interested in aviation for as long as I can remember. I live in Lewes, and I am very active in a local club (Lewes RC) whose members enjoy constructing and operating radio controlled model airplanes.

I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72-76 MHz band. This band is primarily used for private land mobile dispatch operations.

Page 2
FCC Rule Making
February 23, 1992

radio control modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72-MHz band.

Sincerely,

Joe Melchiorre

2524 Kittiwake Drive
Wilmington, DE 19805
17 February, 1993

The Honorable William Roth
United States Senate
Washington, D.C. 20510

AAC 744

Dear Senator Roth,

I have enjoyed a life long interest in aviation, served
in the U.S. Air Force as a combat fighter pilot in Korea

**F. TERRY CARMINE
RD 2, BOX 161
LEWES, DELAWARE 19958**

February 18, 1993

The Honorable William Roth
United States Senate
Washington, DC 20510

ACE 212

Dear Senator Roth;

I am a 61 year old, fully employed, middle class man who has limited time and hobbies. For several years now I have been able to fulfill a long time interest in airplanes by building and flying Radio Controlled Model Planes. I am also active in the local RC Club of about forty members.

I am appealing to you become acquainted with the FCC proposal PR Docket 92-235, which if adopted will greatly reduce the usability of frequencies currently assigned for model use and perhaps result in the destruction of expensive model planes and personal injury. Also, it has only been a few years since the FCC changed our frequencies and made some of our radios obsolete at great expense to us.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Mod 937

The Honorable William V. Roth, Jr.
9th & King Street
Wilmington, De. 19801

February 14, 1993

**RE: NPRM-PR DOCKET 92-235
REALLOCATION OF FREQUENCIES IN THE 72 & 75 MHZ BAND**

As a member of the Delaware Radio Control Model Airplane Club, I oppose the implementation of this frequency reallocation for the following reasons:

SAFETY

Approximately 10 years ago the Academy of Model Aeronautics worked with the FCC to obtain approximately 50 frequencies for the radio control of model craft. At that time the frequencies for aircraft & land/water models were separated into two segments of the band (72 MHZ for aircraft & 75 MHZ for land/water) for safety reasons. In aircraft, the receiver with the associated antenna is hundreds of feet above ground. At that height, the antenna sees a very large area. Another transmitter on or very close to the same frequency within an approximately 2 mile radius of the model superimposes a second signal that confuses the receiver and will cause the model to crash. These models can weigh up to 50 pounds and must fly fast enough to generate lift, similar to full size aircraft. A model can and unfortunately has caused serious injury & property damage when out of control.

Prior to the increase in number of available frequencies, modelers became frustrated waiting to obtain a frequency control card at a developed model flying site & started flying at uncontrolled locations like school yards, little used roads, full size airports & cemeteries. Most of these sites now have ordinances specifically prohibiting this activity because of the liability risk. Not all of the new frequencies are useable today. Many locations have powerful pager transmitters operating on near by frequencies and locations. These useless frequencies are predictable, since the interfering transmitters are fixed & operate nearly around the clock. The mobile service use of the 72 & 75 MHZ frequencies will make almost 1/2 of the modeling frequencies very hazardous to use because of their high power level, compared to the modeling transmitters, and the unpredictable location of the transmitters.

The radio control portion of the modeling hobby has grown significantly since the implementation of the additional frequencies. Many more modelers are using the controlled flying sites because of the convenience and lack of conflict with other modelers demanding the use of the limited frequencies. If a significant portion of these frequencies are lost to the hobby because of this reallocation, I think the frequency use congestion at the model flying sites will drive modelers back to the schoolyards & streets. I don't think we should expose the public or the modeler to this risk, again.

ECONOMICS

All of the model radio control equipment had to be replaced with narrow band equipment prior to 1991 to accommodate the closer frequency spacing required for the new frequencies. The industry spent millions of dollars to develop the narrow band capability and the modelers spent additional millions to upgrade their equipment. Now the FCC is proposing they do it again before 10 years has elapsed.

The radio controlled portion of the hobby is the high cost end. We support many local hobby shops, catalog sales houses, radio equipment, model engine & kit manufacturers and electronic stores. Eliminating any of the currently available radio frequencies will have a long term effect on the hobby by driving modelers out of the hobby.

For these reasons, I request you work to deny the use of this portion of the band to the mobile land phone business.

John A. Scott

1408 Carson Rd.

Wilmington, De. 19803

Academy of Model Aeronautics Member #73940, Leader Member & Contest Director
Society of Antique Modelers Member # 476, S.A.M. Chapter 66 Chairman

5

acd 911

MEMORANDUM

From: Trenor E. Neeves
2105 Coventry Dr.
Wilmington, DE
19810

To: The Honorable William V. Roth, Jr
United States Senate
Washington, D.C. 20510

Subj: FEDERAL COMMUNICATIONS COMMISSION NOTICE OF PROPOSED
RULE MAKING (NPRM - PR DOCKET 92-235)


1. The purpose of this letter is to advise you of the subject proposed rule making soon to be acted upon by the FCC. This ruling blindly affects the radio control community, both air and surface. In essence, we (the R/C community) would have very powerful transmitters bracketing the frequencies we currently use. Additionally, these transmitters would be designated "mobile"; therefore we would never know where they are operating.

2. I am active in a local club (First State R/C Club) which fly on the grounds of Lums Pond State Park. I own numerous pieces of radio equipment that would be rendered unusable if the frequency assignments addressed in the subject ruling passes. The cost, personally, would be approximately \$500.00. Our club, which currently has about 125 members, would be severely impacted.

3. I would also like to take a moment to address the safety of this issue. With models ranging in weight from four (4) to fifteen (15) pounds flying at speeds from 50 to 180 mph, the need for a pilot to have positive control of his or her aircraft is quite evident. As I stated earlier, we fly on public land. We cannot, by law, control who could be near our field at any given time. This only reemphasizes the need for positive pilot control at all times.

4. In summary, I hope I have enlightened you on at least on side of this issue. The impact felt by the R/C community, should this ruling pass, would be devastating. Should you need any further information on this subject, I would be glad to be of assistance. I can be reached at (302) 529-9080 (home), (215) 897-1194, or (703) 602-4845 (latter are work numbers).

Respectfully,


Trenor E. Neeves

February 1, 1993

The Honorable William V. Roth Jr.
9th. & King St.
Wilmington, De. 19801

I am one of hundreds of thousands of men and women who fly radio controlled model airplanes as a hobby. I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-325. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and user inability for controlling model airplanes.

Our radio controlled frequencies are in the 72-76 MHz band. This band is primarily used for private land mobile dispatch operations. However, our radio controlled frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land mobile frequencies will move closer to model airplane frequencies and cause interference to radio control operations. I am told that of the fifty frequencies presently available for control of model airplanes, only nineteen of these will be left if the new rule is adopted.

When I fly a model plane under radio control I go to great lengths to assure the safety of operators and bystanders as well as the protection of property. Many of our safety precautions involve the careful coordination and use of the radio frequencies. If the number of usable frequencies is diminished, as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly reduced.

I do not think it is appropriate of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of citizens who use these assigned frequencies for relaxation and enjoyment. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models both and in time and in money. Not only does the hobby provide many hours of enjoyment to people like myself, but it contributes to the advancement of the commercial aviation industry. In addition, most modelers belong to the Academy of Model Aeronautics and organized local clubs which support civic activities, school programs, and youth groups. The club that I belong to, Delaware R/C Club, has over 100 members. We fly at an airfield that we maintain within Lums Pond State Park.

Please help me to continue the safe enjoyment of my hobby by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Sincerely,

Ron Warden
26 Broadfield Dr.
Newark, DE 19713

W-25

4433
James R. Watson Sr.
32 Meadow Lane
Newark, Delaware 19717
February 11, 1997

Dear Senator William V. Roth Jr.

I am retired from DuPont Company and I get many hours of enjoyment from building and flying radio controlled model airplanes. I am active in our local Delaware R.C. Club. I am also a member of The Academy of Model Aeronautics (A.M.A.) , a national organization.

February 6, 1993

The Honorable William Roth
United States Senate
Washington, D.C 20510

Dear Senator Roth:

I have been interested in aviation for as long as I can remember. I am very active in a club whose members enjoy constructing and operating radio controlled model airplanes.

I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If accepted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72 - 76 MHz band. This band is primarily used for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land mobile frequencies will move closer to the radio control frequencies and cause interference to radio control operations. I am told that of the 50 frequencies that are presently available for radio control of model airplanes, only 19 frequencies will be left if these new rules are adopted.

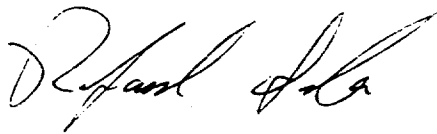
When we fly our model airplanes under radio control, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested, and the margin of safety will be greatly decreased.

Please understand that many model airplanes have wing spans up to 10 feet and weigh as much as 30 or 40 pounds. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models at organized events and contests where hundreds of operators participate. We need the use of our full complement of radio frequencies in order to assure a safe flying environment.

I do not think it is wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC carry out its proposals for the 72-76 MHz band.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Raphael Sela'.

Raphael Sela
1608 Sheldon Dr

000 036

January 22, 1993

The Honorable WILLIAM ROTH
Address UNITED STATES SENATE
WASHINGTON DC 20575

I am one of hundreds of thousands of men and women who fly radio controlled model airplanes as a hobby. I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-325. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and user inability for controlling model airplanes.

acc 084

February 1, 1993

The Honorable William Roth
United States Senate
Washington, D.C. 20510

Dear Senator Roth:

I am the public relations chairman for the First State Radio Control Club. We are an association that enjoys building and flying radio controlled miniature aircraft and we have over 50 members in our club.

I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72-76 MHz band. This bank is primarily used for private land mobile dispatch operations. However, our radio control frequencies in this bank are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the bank plan. As a result, many land mobile frequencies will move closer to the radio control frequencies and cause interference to radio control operations. I am told that of the 50 frequencies that are presently available for radio control of model airplanes, only 19 frequencies will be left if these new rules are adopted.

When we fly our model airplanes under radio control, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly decreased.

Please understand that many model airplanes have wing spans up to 10 feet and weigh as much as 30 or 40 pounds. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models at organized events and contests where hundreds of operators participate. We need the use of our full complement of radio frequencies in order to assure a safe flying environment.

I do not think it is wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The FCC may not think we are as important as business users of the radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Sincerely,

James H. Lillie

James H. Lillie
503 Bluegrass Drive
Wilmington, DE 19808

JHL/bs

January 22, 1993

The Honorable
Address

Senator Roth
104 Hart Senate Office Bldg
Washington DC 20510

ACE 249

I am one of hundreds of thousands of men and women who fly radio controlled model airplanes as a hobby. I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-325. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and user inability for controlling model airplanes.

Our radio controlled frequencies are in the 72-76 MHz band. This band is primarily used for private land mobile dispatch operations. However, our radio controlled frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land mobile frequencies will move closer to model airplane frequencies and cause interference to radio control operations. I am told that of the fifty frequencies presently available for control of model airplanes, only nineteen of these will be left if the new rule is adopted.

When I fly a model airplane under radio control I go to great lengths to assure the safety of operators and bystanders as well as the protection of property. Many of our safety precautions involve the careful coordination and use of the radio frequencies. If the number of usable frequencies is diminished, as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly reduced.

I do not think it is appropriate of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of citizens who use these assigned frequencies for relaxation and enjoyment. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models both in time and in money. Not only does the hobby provide many hours of enjoyment to people like myself, but it contributes to the advancement of the commercial aviation industry. In addition, most modelers belong to the Academy of Model Aeronautics and organized local clubs which support civic activities, school programs, and youth groups.

Please help me to continue the safe enjoyment of my hobby by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Sincerely,

Mark Plucenik Plucenik
106 Carter Ln
Camden DE 19934
302-697-6892

2/15/93

Dear Senator Roth,

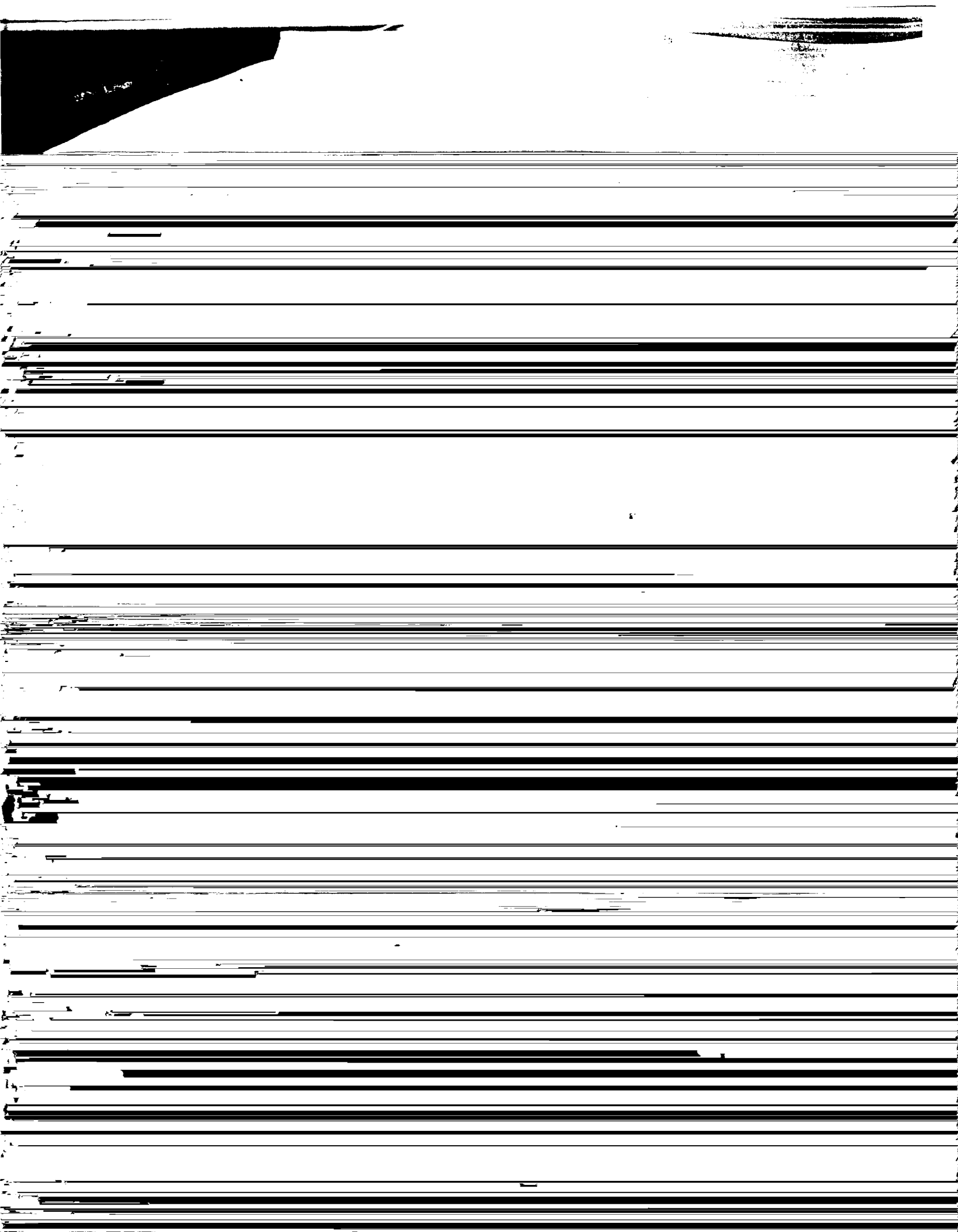
I am an active member in a local club whose members enjoy constructing & operating Radio Controlled model airplanes.

I am very concerned about Proposed Rules that are currently under consideration by The FCC. The Proceeding is P.R. docket 92-235.

If adopted, The new Rules will greatly reduce the usability of Frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our Radio Control Frequencies are 72-76 MHz Band. This Band is primarily used for Private Land mobile Dispatch operations. However, our Radio Control Frequencies in this Band are far enough apart from the Land mobile Frequencies that we have been able to share the Band without either use interfering with each other.

Now the FCC wants to create more Land



1 Erbitea Lane
New Castle, DE 19720
302-324-9302

February 16, 1993

The Honorable William Roth
U. S. House of Representatives
Washington, DC 20515

RE: PR Docket 92-235

ACE 250

Dear Mr. Roth:

I am an avid model yacht sailor. I am actively involved in local and national model yachting events run through the American Model Yachting Association (AMYA). Our local club operates in a pond within a public park in Mount Laurel, NJ.

I am very concerned about the above referenced proposed rules currently under consideration by the Federal Communications Commission (FCC). If adopted, the affect on part 95 will greatly reduce the usability of frequencies currently assigned to model use and increase the risk of accidents and attendant liability for controlling model boats and airplanes.

Our radio control frequencies share the 72 and 75 MHz band

~~with the frequencies used by the FCC for the same purpose.~~

miles per hour. The models themselves are expensive to build. In fact, I personally have over \$500 worth of radio

February 14, 1993

The Honorable William V. Roth, Jr
9th and King Streets
Wilmington DE

ACE 371

Dear Senator Roth:

For the past forty years, I have been involved in building and flying radio-controlled (R/C) model airplanes, and plan to continue this valuable and enjoyable hobby for the rest of my life. I am a member and a past-president of the Delaware R/C Modeling Club, which has over one hundred members and is chartered by the national Academy of Model Aeronautics (AMA), an organization of several hundred thousand fellow modelers. Our club, which flies within the confines of a Delaware State park, goes to great lengths to ensure that our aircraft are safe and that club members are trained in all areas of safe and proper operation of their models. There is now, however, a potential problem which can decrease our ability to fly safely and increase the risk of bodily injury and property damage to our members and to the many bystanders who come to our field to enjoy a day in the park while watching our planes fly.

It is my understanding that the Federal Communications Commission is proposing a rules change (PR Docket 92-235), which will seriously affect our ability to fly safely in our 72-76 MHz band of frequencies. I strongly oppose this change. This new proposal will make the majority of frequencies currently used for R/C models unusable and

Elliott P. Smith
2908 Mattahoon Road
Wilmington, DE 19808

February 24, 1993

Sen. William V. Roth Jr.
104 Hart Senate Office Building
Washington, DC 20510

ACE 372

Reference FCC proposed rule NPRM PR Docket 92-235

Dear Senator Roth,

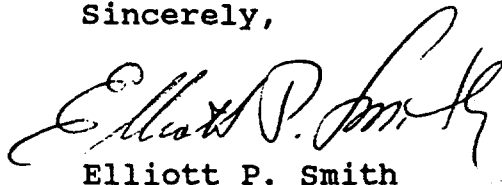
I am deeply disturbed by the Federal Communications Commission proposed frequency allocation changes presented in the above referenced rule change. Implementation of this document will severely affect the safe operation of remote controlled model aircraft currently operating under part 95 of the FCC regulations

The proposed rules would allow relatively high power mobile land service transmitters to operate within our assigned frequency bands with the likely prospect of unpredictable interference with our control transmissions. The loss of positive control of a model aircraft in flight poses an extreme safety hazard that could result in personal injury and property damage.

I have been building and flying radio controlled aircraft for over 30 years and safety has always been of vital concern to myself, my flying club and our national organization the Academy of Model Aeronautics. I personally have well over \$5000 of aircraft and equipment invested in this avocation and fear not only the loss of my valuable property from accidents due to outside interference but also the liability I would incur if some one were injured.

I implore you to take whatever steps are necessary to block this proposed rule change.

Sincerely,



Elliott P. Smith